

Ex. 'C'



Entered on Docket
August 31, 2010

Bruce A. Markell

Hon. Bruce A. Markell
United States Bankruptcy Judge

REYNOLDS & ASSOCIATES, LLC

Electronically Filed on
August 26, 2010

RONALD H. REYNOLDS, ESQ.

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Attorneys for Secured Creditor, BAC Home Loans Servicing, LP, fka Countrywide Home Loans Servicing, LP, fka Countrywide Home Loans, Inc., its assignees and/or successors in interest

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA, LAS VEGAS DIVISION

In re

) BK-S -09-29123-BAM

)

MELANI SCHULTE and

)

WILLIAM R. SCHULTE,

)

)

Hearing:

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Date: 8/24/10

)

Debtors.

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Time: 2:30 p.m.

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Chapter 11

AGREED ORDER RE ADEQUATE PROTECTION

BAC Home Loans Servicing, LP, fka Countrywide Home Loans Servicing, LP, fka

1 Countrywide Home Loans, Inc., its assignees and/or successors in interest, Secured Creditor, submits
2 herein its Agreed Order Re Adequate Protection. The Court after careful review of the Court records
3 and files and agreement by the parties, makes its Order as follows:

4 IT IS ORDERED, ADJUDGED AND DECREED that Debtors shall maintain the
5 regular amortized monthly payments of \$551.14 at 5.25% over 30 years for the total loan amount of
6 \$99,806.60 on Secured Creditor's loan obligation, encumbering the subject Property, generally
7 described as **3322 Cheltenham Street, Las Vegas, Nevada**, in a timely fashion, commencing with
8 the September 1, 2010 payment. Payments on Secured Creditor's loan obligation shall be made to
9 Secured Creditor, BAC Home Loans Servicing, LP, Bankruptcy Department, Mail Stop TX 2-982-03-
10 03, 7105 Corporate Drive, Plano, Texas 75024.

11 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Debtors shall
12 maintain insurance on the subject property, naming Secured Creditor as loss payee as well as maintain
13 the property taxes on the subject property

14 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that if the Debtors fail
15 to maintain the regular monthly payments on Secured Creditor's Trust Deed obligation, allowing the
16 normal grace period, or fails to maintain the property taxes or insurance, then Secured Creditor may
17 file and serve upon Debtors and Debtors' counsel, a Fifteen (15) Day Notice Declaration Re Breach of
18 Condition. For each such Declaration Re Breach of Condition filed, there shall be an assessed
19 attorneys' fee of \$75.00, to be paid directly to Secured Creditor's counsel Prober & Raphael, A Law
20 Corporation, PO Box 4365, Woodland Hills, CA 91365-4365 upon reinstatement. If upon the
21 sixteenth (16th) day Debtors have failed to cure the delinquency which must include said \$100.00 in
22 attorneys' fees, then Secured Creditor may submit to this Court an Affidavit of Default with an Order
23 vacating the automatic stay as to Secured Creditor, and Secured Creditor may thereafter proceed with
24 foreclosure proceedings upon the subject Property, pursuant to applicable state law, and take any
25 action necessary to obtain complete possession thereof.

26 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that in the event the
27 instant bankruptcy proceeding is dismissed or discharged, this Order shall be terminated and have no
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1 further force or effect.

2 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any funds
3 received by Secured Creditor, which are subsequently returned for non-sufficient funds, including funds
4 received and applied prior to the terms of this Order, shall be subject to the default provisions
5 contained herein.

6 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the terms and
7 conditions of this Stipulation may not be modified, altered or changed in any Chapter 11 Plan for
8 Reorganization without the express written consent of Secured Creditor.

9 Submitted By:

10 REYNOLDS & ASSOCIATES, LLC

11
12
13 By: 
14 RONALD H. REYNOLDS, ESQ.

15 Nevada Bar #000827

16 823 Las Vegas Boulevard South, Suite 280

17 Las Vegas, NV 89101

18 Local Counsel for Movant

19 APPROVED/DISAPPROVED:

20 By: 
21 BRYAN A. LINDSEY, ESQ.

22 Attorney for Debtor
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